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7 Attorneys for GOOGLE LLC

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendants.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO SONOS, INC.'S
MOTION FOR LEAVE TO AMEND
INFRINGEMENT CONTENTIONS
PURSUANT TO PATENT L.R. 3-6**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Administrative Motion to File Under Seal Portions of its Opposition to Sonos, Inc.’s Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6 (“Google’s Administrative Motion”). If called as a witness, I could and would testify competently to the information contained herein.

2. Google’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Opposition to Sonos’s Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6 (“Google’s Opposition”)	Portions highlighted in yellow	Google
Exhibit 1 to Google’s Opposition	Portions outlined in red boxes	Google

3. The yellow-highlighted portions of Google’s Opposition on pages 5, 6, and 7 and the portions of Exhibit 1 outlined in red boxes detail the operation of functionalities Sonos accuses of infringement. These documents contain highly confidential and proprietary information regarding sensitive features of Google’s product and system designs and describe the operation of functionalities accused of infringement. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Public disclosure of such information could lead to competitive harm to Google as competitors may alter their systems and practices relating to competing products. Thus, Google has good cause to seal the yellow-highlighted portions of Google’s Opposition on pages 5, 6, and 7 and the portions of Exhibit 1 outlined in red boxes. A less restrictive alternative than sealing these documents would not be sufficient because the information sought to be sealed is Google’s proprietary and confidential business information but is necessary to the argument in Google’s Opposition.

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ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: March 16, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven